

# Compliance Testing

2007 EMA Certification Workshop

April 24, 2007



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U.S. Environmental  
Protection Agency

# Testing Goals

- Confirmatory Certification Testing
  - Establishing a compliance presence
  - Delivering the emission benefits of regulations
  - Ensuring a level playing field
  - Finding and remedying emission problems prior to introduction into commerce
  - Encouraging compliance and deterring non-compliance



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# NRCI

- 2006

- Four engine families tested - All in compliance with standards
- Met with manufacturers individually

- 2007

- Four engine families selected (letters sent) - Approximately four more this FY



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# NRCI

- Lessons Learned

- Revisions made to engine set up document

- Clarifying info requested from manufacturers
    - Additional test cell diagram provided

- Appropriate engine hours for conf. cert. tests

- Regulations 40 CFR 89.118 (a)(2) - A manufacturer may elect to consider as stabilized emission levels from engines with no more than 125 hours of service.

- EPA guidance – Engines should have less than 125 hours



# Future Testing

- Eventually expand to other industries
- Nonroad SI confirmatory cert testing
  - Beginning Fall 07
  - Industry meeting in July
  - Initial focus on Non Handheld
- Highway diesel confirmatory cert testing
  - Plan to begin in MY2010
  - Incorporate testing time into your development/certification/production schedule
- Submitting certification plans will minimize delays



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# In Use Testing

- Selections for 2007 Manufacturer In Use Selections made for Marine SI, Large SI and Locomotive Industries
  - Plans required for LSI and Loco
  - Use templates to report results
- 2006 HD In Use Selection letters sent last December
  - PM pilot program delayed until 2007
  - 2006 Reports due December 2008
  - DFR for accuracy margins to be published this summer



# LD Experience

- Integrated program assuring emission compliance:
  - 400 LD Certificates issued annually
  - Pre-Production Certification
    - Ensure pollution prevention through proper design
    - Detects problems early
    - 200 EPA conf. cert tests per year ( $\approx 15\%$  of vehicle models)
    - 1200 manufacturer cert tests annually
  - Production Line Testing
    - Verify that production vehicle matches certified prototype
    - Rarely used because of strong cert and in use program
  - In-use Testing & Recall
    - Find and remedy problems
    - 150 EPA tests per year
    - 2000 Manufacturer In Use Verification Program (IUVP) test per year
    - 1 – 3 million vehicles recalled per year

